

1 Honorable Robert S. Lasnik
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 SHOKOFEH TABARAIE, DDS, PLLC,
10
11 Plaintiff,

Civil Action No. 2:20-cv-01035-RSL

12 v.
13 ASPEN AMERICAN INSURANCE
14 COMPANY,
15
16
17

Defendant.

**STIPULATED MOTION AND
ORDER TO EXTEND TIME**

18 Plaintiff Shokofeh Tabaraie, DDS, PLLC and Defendant Aspen American Insurance
19 Company stipulate that Defendant's deadline to answer or otherwise respond to the Complaint
20 in this action is extended for a total of 14 days to August 31, 2020.

21 WHEREAS:

22 1. Defendant's current deadline to answer or otherwise respond to the Complaint is
23 August 17, 2020.
24 2. Due to the COVID-19 pandemic and related matters, Defendant and its counsel
25 require additional time to investigate certain allegations in the complaint.

26
STIPULATED MOTION AND ORDER TO
EXTEND TIME - 1
(2:20-CV-01035-RSL)

SIDLEY AUSTIN LLP
1420 Fifth Avenue, Ste. 1400
Seattle, Washington 98101
Tel: (415) 439-1799

3. The Parties have met and conferred and Plaintiff has agreed to extend Defendant's deadline to answer or otherwise respond to the Complaint by 14 days to August 31, 2020.

4. The Parties represent that this stipulated motion is made in the interest of justice, not to delay the proceedings, and will not prejudice any party;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that Defendant's deadline to answer or otherwise respond to the Complaint shall be extended from August 17, 2020 to August 31, 2020.

The Parties respectfully request the Court to enter the accompanying Proposed Order extending Defendant's deadline to answer or otherwise respond to the Complaint to August 31, 2020.¹

DATED this 12th day of August, 2020.

PRESENTED BY:

RUIZ & SMART
PLAINTIFF LITIGATION PLLC

/s/ Isaac Ruiz
Isaac Ruiz, WSBA No. 35237
RUIZ & SMART PLAINTIFF
LITIGATION PLLC
95 S. Jackson St., Suite 100
Seattle, WA 98104
Telephone: (206) 203-9100
Facsimile: (206) 785-1702
iruiz@plaintifflit.com

Attorney for Plaintiff

SIDLEY AUSTIN LLP

/s/ Robin E. Wechkin
Robin E. Wechkin, WSBA No. 24746
SIDLEY AUSTIN LLP
1420 Fifth Avenue, Suite 1400
Seattle, WA 98101
Telephone: (415) 439-1799
rwechkin@sidley.com

Yvette Ostolaza, *pro hac vice* forthcoming
Yolanda C. Garcia, *pro hac vice* forthcoming
SIDLEY AUSTIN LLP
2021 McKinney Avenue, Suite 2000

¹ Aspen American Insurance Company expressly reserves its rights, subject to, and without waiving, its ability to challenge in personam jurisdiction and assert any defense to this action, including, but not limited to, its rights to move to dismiss based on jurisdiction, arbitration, venue, and/or failure to state a claim.

**Signed with permission.*

Dallas, Texas 75201
Telephone: (214) 981-3401
Facsimile: (214) 981-3400
yvette.ostolaza@sidley.com
ygarcia@sidley.com

Attorneys for Defendant

STIPULATED MOTION AND ORDER TO
EXTEND TIME - 3
(2:20-CV-01035-RSL)

SIDLEY AUSTIN LLP
1420 Fifth Avenue, Ste. 1400
Seattle, Washington 98101
Tel: (415) 439-1799

ORDER

The Court has considered Defendant Aspen American Insurance Company's Stipulated Motion and [Proposed] Order to Extend Time. The Court HEREBY ORDERS that the deadline for Defendant to answer or otherwise respond to the complaint in the above-captioned matter is extended to August 31, 2020.

IT IS SO ORDERED.

DATED this 12th day of August, 2020.

Mr S Casnik

Honorable Robert S. Lasnik
UNITED STATES DISTRICT JUDGE

SIDLEY AUSTION LLP

PRESENTED BY:

DATED this 12th day of August, 2020.

/s/ Robin E. Wechkin
Robin E. Wechkin, WSBA No. 24746
SIDLEY AUSTIN LLP
1420 Fifth Avenue, Suite 1400
Seattle, WA 98101
Telephone: (415) 439-1799
rwechkin@sidley.com

Yvette Ostolaza, *pro hac vice* forthcoming
Yolanda C. Garcia, *pro hac vice* forthcoming
SIDLEY AUSTIN LLP
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
Telephone: (214) 981-3401
Facsimile: (214) 981-3400
yvette.ostolaza@sidley.com
ygarcia@sidley.com

Attorneys for Defendant

STIPULATED MOTION AND ORDER TO
EXTEND TIME - 4
(2:20-CV-01035-RSL)

SIDLEY AUSTIN LLP
1420 Fifth Avenue, Ste. 1400
Seattle, Washington 98101
Tel: (415) 439-1799